

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Christopher Plissey, Border Patrol Agent of the United States Border Patrol, being first duly sworn, hereby depose and state as follows:

1. I am a Border Patrol Agent with the United States Border Patrol. Currently, I am stationed at Van Buren Station, Houlton Sector. I graduated from Woodland JR SR. High School in Woodland, Maine in June 2020. Prior to being stationed in Van Buren, I was a Corrections Officer in Bangor Maine at Penobscot County Jail. I have been an employee of the United States Border Patrol since June 10th, 2024. I successfully graduated from the Border Patrol Academy in Artesia, New Mexico in January 2025.

2. I make this affidavit in support of a Criminal Complaint charging BERNARDO ANTONIO CRUZ with one count of Illegal Re-Entry After Deportation, in violation of Title 8, United States Code, Section 1326(a). The information contained in this affidavit is based on my review of reports prepared by other law enforcement officers and conversations with involved personnel, as well as my training and experience as a United States Border Patrol agent.

3. On June 29, 2025, the Van Buren Border Patrol Station received information from a concerned citizen that numerous subjects may be present in the country illegally. The concerned citizen stated that the subjects had recently checked in to the Gateway Inn in Madawaska, Maine. The concerned citizen provided information on the subjects staying at the hotel.

4. Utilizing this information, USBP agents were able to conduct immigration checks which showed the subjects were present in the United States without proper documentation to be in or remain in the United States legally.

5. On July 1, 2025, at approximately 6:59 am, I, Border Patrol Agent Christopher

6. Plissey, along with Agent David Ford observed one of the subjects, (Bernardo ANTONIO CRUZ) that was referred to Border Patrol by the concerned citizen. Earlier research revealed that this subject was not in possession of immigration documents that would allow him to be or remain in the United States. At the time of the observation, ANTONIO CRUZ was a passenger in a bucket truck being operated on Main Street in Madawaska. Agents followed behind the vehicle for approximately 15 minutes before the vehicle turned into Roy's Variety Gas Station. While at the gas station, agents drove past the vehicle and made visual identification of ANTONIO CRUZ as one of the passengers.


7. After identifying ANTONIO CRUZ, agents requested a marked border patrol unit to perform a vehicle stop. ANTONIO CRUZ, and one additional subject from the vehicle stop, freely admitted to being present in the United States illegally and were transported to the Van Buren Border Patrol Station for further processing.

8. At the Van Buren Border Patrol Station, it was determined that ANTONIO CRUZ did not have any previous criminal history but had been previously removed from the United States on February 25, 2014, via Brownsville, Texas. When interviewed by a USBP agent at the station, ANTONIO CRUZ admitted to entering the United States illegally, not being inspected by an immigration officer or entering through a Port of Entry. He stated that his purpose for entering the United States was to have a better future.

9. A further records check of ANTONIO CRUZ found no potential claim to United States Citizenship. As noted above, ANTONIO CRUZ previously told USBP agents that he does not possess any immigration documents that would allow him to enter, remain in, or pass through the United States.

10. Based on my training and experience, and supported by the foregoing facts, I have probable cause to believe the defendant violated Title 8, United States Code, Section 1326(a). I respectfully request that the accompanying Criminal Complaint be issued.

11. I, Christopher Plissey, hereby swear under oath that the information set forth in this affidavit is true and correct to the best of my knowledge, information, and believe, and I make this oath under pains and penalties of perjury.


  
Christopher Plissey  
Border Patrol Agent  
U.S. Border Patrol

Sworn to telephonically and signed  
electronically in accordance with the  
requirements of Rule 4.1 of the Federal Rules  
of Criminal Procedure

Date: Jul 03 2025

City and state: Bangor, ME



  
Judge's signature  
John C Nilsson U.S. Magistrate Judge

Printed name and title